## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors. 1

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

## MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S APPEARANCE AT THE OCTOBER 30-31 OMNIBUS HEARING

COMES NOW AmeriNational Community Services, LLC (hereafter "AmeriNat") as servicer for the GDB Debt Recovery Authority (the "DRA") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures for Attendance*, *Participation and Observation of October 30-31, 2019 Omnibus Hearing* (the "Scheduling Order") (Dkt. No. 8912):

1. Nayuan Zouairabani of McConnell Valdés, LLC will appear on behalf of AmeriNat at the October 30-31 omnibus hearing (the "Hearing"). Counsel Zouairabani will appear in person

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767. Counsel Zouairabani hereby reserves the right to present oral argument in connection with the pleadings to be identified in the Hearing's agenda (which has yet to be filed) to the extent that any of these pleadings either relate to, or affect, AmeriNat and/or the DRA's rights in the Title III proceedings, or otherwise respond, as necessary, to any statements made by any party at the Hearing as to any related matters of the instant Title III case

**WHEREFORE**, AmeriNat respectfully requests the Court to take note of the foregoing, and deem AmeriNat in compliance with the Scheduling Order (Dkt. 8912).

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of October, 2019.

## MCCONNELL VALDÉS LLC

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By: s/Nayuan Zouairabani

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WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case, and that we served the foregoing upon all the Standard Parties as identified and defined at ¶ II(A) of the Court's *Tenth Amended Notice, Case Management, and Administrative Procedures* (Dkt. No. 8027 of Case No. 17-03283 (LTS)).